

District Judge James L. Robart

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

JULIO CURY, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF STATE, *et al.*,

Defendants.

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Civil Action No.: 2:23-cv-00499-JLR

STIPULATION FOR AN EXTENSION  
OF TIMENoted for Consideration:  
March 3, 2025

As previously noted, the parties are continuing to explore whether a compromise on the remaining issues in controversy can be reached. On 15 January 2025, Plaintiffs agreed to significantly narrow the scope of the remaining issues in controversy, and Defendant Department of State (“State”) began considering the matter internally. On 28 February, State’s counsel advised Plaintiffs’ counsel that State anticipated being able to provide an update by 7 March.

Accordingly, and for the same reasons described in the previous stipulation, the parties stipulate to and propose the following schedule:

1. Plaintiffs will file their opposition and cross-motion, if any, on or before 25 March 2025;

2. Defendants will file their reply and opposition to any cross-motion on or before  
15 April 2025; and

3. Plaintiffs will file their reply in support of any cross-motion on or before 6 May  
2025.

Date: March 3, 2025

Respectfully submitted,

NATIONAL SECURITY COUNSELORS

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I certify that this memorandum contains 315  
words, in compliance with the Local Civil  
Rules.

*Counsel for Defendants*

**[PROPOSED] ORDER**

It is so ORDERED.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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JAMES L. ROBART  
United States District Judge